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Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOHN EDWARD CLARK, individually,
ANGELIQUA CHENEE GROCE,
individually, and DANNESHA
KIRKWOOD,
individually,
Plaintiff,

vs.

SUN COUNTRY HOLDINGS, INC., a
foreign corporation; DOE INDIVIDUALS I
through X, inclusive; and ROE ENTITIES I
through X, inclusive,
Defendants.

Case No. 2:24-cv-00379-CDS-BNW

**STIPULATION TO EXTEND TIME
FOR PARTIES TO SERVE
DISCLOSURE OF EXPERTS AND
EXPERT REPORTS**

**Current deadline: June 24, 2024, for
Initial Expert and July 22, 2024, for
Rebuttal Expert
New deadline: August 23, 2024, for Initial
Expert and September 20, 2024, for
Rebuttal Expert**

Plaintiffs, JOHN EDWARD CLARK, individually, ANGELIQUA CHENEE GROCE,
individually, and DANNESHA KIRKWOOD, individually (“Plaintiffs”), by and through their
counsel of record, MICHAEL L. SHIRTS, ESQ., of DIMOPOULOS INJURY LAW; Defendant
SUN COUNTRY AIRLINES HOLDINGS, INC. (“Sun Country”), by and through its counsel,

1 DANIEL A. MANN, ESQ., MARK A. DOMBROFF, ESQ., and JAMES A. EASTWOOD,
2 ESQ., of FOX ROTHSCHILD LLP, hereby stipulate to extend the deadline for Parties to serve
3 their disclosure of experts and expert reports for a period of sixty (60) days, up to and
4 including **August 23, 2024**.

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6 1. On April 4, 2024, the Court issued an Order setting the discovery schedule.

7
8 2. Per the Court's Order, the deadline for Parties to serve disclosure of experts and
9 expert reports was by June 24, 2024.

10 3. The parties are looking to mediate this matter and require this deadline to be
11 extended to provide ample time to schedule a date to avoid unnecessary litigation costs before
12 mediation.

13
14 4. Accordingly, the Parties agree and stipulate to extend the deadline for Parties to
15 serve their disclosure of experts and expert reports for a period of sixty (60) days, up to and
16 including **August 23, 2024**.

17 5. This deadline extension would require the deadline for rebuttal expert disclosures
18 to be extended as well to avoid the deadline to be before the initial disclosures of expert witnesses.

19
20 6. Accordingly, the Parties agree and stipulate to extend the deadline for Parties to
21 serve their disclosure of rebuttal experts and expert reports for a period of sixty (60) days,
22 **September 20, 2024**, which is 29 days after disclosure of experts since the typical 30 days falls
23 on a Saturday.

24
25 8. The Parties respectfully request that the Court enter an Order consistent with the
26 Parties' Stipulation as detailed herein.

1 DATED this 3rd day of June, 2024

2 **FOX ROTHSCHILD LLP**

3 /s/ Daniel A. Mann

4 DANIEL A. MANN, 15594

5 MARK A. DOMBROFF (PHV Admitted)

6 JAMES A. EASTWOOD (PHV Admitted)

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18 *Attorneys for Defendants*

19 **DIMOPOULOS INJURY LAW**

20 /s/ Michael L. Shirts

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Case No. 2:24-cv-00379-CDS-BNW

**[PROPOSED] ORDER ON
STIPULATION TO EXTEND TIME FOR
PARTIES TO SERVE DISCLOSURE OF
EXPERTS AND EXPERT REPORTS**

**Current deadline: June 24, 2024, for Initial
Expert and July 22, 2024, for Rebuttal
Expert
New deadline: August 23, 2024, for Initial
Expert and September 20, 2024, for
Rebuttal Expert**

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IT IS SO ORDERED.

By Brenda Weksler
Hon. Brenda Weksler
Magistrate Judge